

Randall B. Bateman (USB 6482)  
Lyndon R. Bradshaw (USB 15097)  
DURHAM JONES & PINEGAR  
111 South Main Street, Suite 2400  
Salt Lake City, UT 84111  
(801) 415-3000  
rbateman@djplaw.com; lbradshaw@djplaw.com; nbladen@djplaw.com

*Attorneys for Plaintiff Lone Star Promotions, LLC*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, NORTHERN DIVISION**

---

LONE STAR PROMOTIONS, LLC, a Florida limited  
liability company

Plaintiff,

vs.

ABBEY LANE QUILTS, LLC, a Florida limited  
liability company; ABBEY LANE QUILTS, a Florida  
at-will partnership, and JANICE LILJENQUIST, an  
individual

Defendants.

Case No. 1:18-cv-00073-DAK-EJF

**PLAINTIFF'S REQUEST FOR  
EXPEDITED HEARING**

Judge Dale A. Kimball

Magistrate Judge Evelyn J. Furse

Plaintiff Lone Star Promotions, LLC ("Lone Star") hereby requests this Court to conduct an expedited hearing on Plaintiff's Motion for TRO/Preliminary Injunction Barring the Utah State District Court In and For Weber County, Utah from Interfering with the Copyrights of Plaintiff Lone Star Promotions, LLC.

I. NOTICE

Counsel for Defendants were served with a copy of Plaintiff's motion via CM/ECF on October 4, 2018, and the Utah State District Court In and For Weber County was served by first class mail on that same date as evidence by the Certificate of Service filed with the motion.

II. EXPEDITED MOTION

The purpose of the motion is to allow Lone Star Promotions, LLC and its owner Marcea Owen to participate in Quilt Market, one of the largest quilting tradeshow in the United States, on November 1-5, 2018 independent of Defendants. For 8 months Marcea Owen has been compelled by the Utah State District Court In and For Weber County to remain a member of Defendants Abbey Lane Quilts despite the clear ability to dissociate under Florida law.

Moreover, the state court has enjoined Owen from selling patterns designed by Lone Star on the basis that the patterns are trade secrets of Abbey Lane Quilts, even though the patterns are sold to the public and the state court acknowledged in a hearing on September 14, 2018 that the patterns cannot be trade secrets.

For 8 months Owen and Lone Star have been deprived of income as Liljenquist has run Abbey Lane Quilts as a hobby – no longer attending trade shows and conducting minimal advertising. Quilt Market is the last major trade show in the industry until spring of 2019. The injunction would allow Owen to reenter her chosen profession of the last 10 years and to sell Lone Star's patterns free of Liljenquist's control. Failure to attend Quilt Week will require Owen to wait at least 4 more months before being able to launch as a separate entity.

III. BRIEFING

Lone Star proposes the following briefing schedule:

Defendants Opposition Brief due October 12, 2018.

Plaintiff's Reply Brief due October 19, 2018.

Hearing as soon thereafter as possible.

Plaintiff notes that the arguments regarding the improper terms of the state court's order have been repeatedly raised by Lone Star since it filed its Opposition of Non-Party Lone Star Promotions, LLC to Plaintiff's Motion for Contempt and For Attorneys' Fees on May 25, 2018. Defendants withdrew their motion for contempt as Lone Star's counsel was presenting his argument so that the state court would not reach the merits of the issue. Defendants then sought extension to delay the state court from addressing the same issues in response to Owen's Motion to Defendants to Vacate Preliminary Injunction under Rule 65A, for Order Requiring Return of Property, or in the Alternative, for Posting of a Bond, filed on August 27, 2018. The state court has stayed the case with the injunction in place without addressing the issues raised by Lone Star and Owen.

It is submitted that the hearing may be simply legal argument as the jurisdictional issue and the constitutional issue are both questions of law. It is believed that one (1) hour would be sufficient for the hearing.

#### IV. REPRESENTATION

Defendant has counsel and counsel has made an appearance in the case.

#### V. ORDER

A Proposed Temporary Restraining Order is attached hereto.

DATED: October 5, 2018.

DURHAM JONES & PINEGAR

/s/ Randall B. Bateman

Randall B. Bateman

Lyndon Bradshaw

111 South Main Street, Suite 2400  
Salt Lake City, UT 84111

*Attorneys for Plaintiff Lone Star Promotions, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5<sup>th</sup> day of October, I caused a true and correct copy of the foregoing PLAINTIFF'S MOTION FOR EXPEDITED HEARING to be filed with the Clerk of the Court via CM/EFC, and served via the CM/ECF email system to the following:

Bruce Pritchett  
Ryan Rudd  
Nathan Hoopes  
THE RUDD FIRM, P.C.  
10150 Centennial Pkway, Suite 150  
Sandy, UT 84070  
bpritchett@ruddfirm.com

And that a copy was served via U.S. Mail as follows:

The Honorable Joseph M. Bean  
2<sup>nd</sup> Judicial District Court – Weber County  
2525 Grant Avenue  
Ogden, UT 84401

/s/ Randall B. Bateman